



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

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April 26, 2024

**By ECF**

The Honorable Dale E. Ho  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Helen Greene Johnson v. United States of America*, 24 Civ. 872 (DEH);  
*Muhammad A. Aziz v. United States of America*, 24 Civ. 874 (DEH)

Dear Judge Ho:

This Office represents the United States of America (“Government”), defendant in these two related actions brought pursuant to the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671 *et seq.* The Government is preparing to file its motion to dismiss on April 30. *See* ECF 28. The Government writes respectfully to request leave to file an opening memorandum of law of up to 36 pages in length. The reason for this request is that the Government requires additional pages to properly address plaintiffs’ claims, given the number of claims brought and the complexity of issues raised. Plaintiffs in both actions consent to this request.

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York

By: /s/ Ilan Stein  
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cc: Plaintiff’s counsel (via ECF)